



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 28, 2016

Susan Stracquatano
Arborjet, Inc.
c/o Delta Analytical Corp.
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Subject: Notification per PRN 98-10 – “correct typographical error”
Product Name: Tree-age G4
EPA Registration Number: 74578-10
Application Date: 10/31/16
Decision Number: 523285

Dear Ms. Stracquatano,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, please contact Jessica Rogala by phone at 703-347-0263, or via email at rogala.jessica@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Rogala".

Mark Suarez, Product Manager 07
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs



NOTIFICATION

74578-10

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

12/28/2016

(Master label)

TREE-äge G4

Injected insecticide for two-year control of listed insect and mite pests in deciduous, coniferous, and palm trees

Active Ingredient:	
Emamectin Benzoate ¹	4.0%
Other Ingredients:	<u>96.0%</u>
Total:	100.0%

¹CAS No.155569-91-8
Contains 0.36 lbs. emamectin per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION / AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional precautionary statements and directions for use on label [in booklet].

EPA Reg. No. 74578-XXXX

EPA Est. No. 74578-MA-001

[Product of United States]
[Formulated in United States]

Net Contents:

[1/2 Quart] [1/2 Liter] [1.06 Quart] [1 Liter] [1 Quart] [.946 Liter] [1 Gallon] [3.785 Liter]
[30 Gallon] [114 Liter] [55 Gallon] [208 Liter]

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION/AVISO - Moderately irritating to the eye. Do not get in eyes or on clothing. Wear protective eyewear. Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

FIRST AID	
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
<p>NOTE TO PHYSICIAN: Early signs of intoxication include dilation of pupils, muscular incoordination, and muscular tremors. Vomiting within one-half hour of exposure can minimize toxicity following accidental ingestion of the product; rapidly after exposure (< 15 minutes) administer repeatedly medical charcoal in a large quantity of water or ipecac. If toxicity from exposure has progressed to cause severe vomiting, the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parenteral fluid replacement therapy should be given, along with other required supportive measures (such as maintenance of blood pressure levels and proper respiratory functionality) as indicated by clinical signs, symptoms, and measurements. In severe cases, observations should continue for at least several days until clinical condition is stable and normal. Since emamectin benzoate is believed to enhance GABA activity in animals, it is probably wise to avoid drugs that enhance GABA activity (barbiturates, benzodiazepines, valproic acid) in patients with potentially toxic emamectin benzoate exposure.</p>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<p style="text-align: center;">HOT LINE NUMBER For 24-Hour Medical Emergency Assistance (Human or Animal), Or Chemical Emergency Assistance (Spill, Leak, Fire or Accident) Call 1-800-255-3924</p>	

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves such as barrier laminate; butyl rubber; nitrile rubber; or neoprene rubber.
- Shoes and socks
- Protective eyewear

Environmental Hazards

This product is highly toxic to fish, mammals and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater. This product is highly toxic to bees exposed to direct treatment or residues on blooming trees.

Physical or Chemical Hazards

Do not use or store near heat or open flame.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ARBORJET, INC. or Seller. To the extent permitted by applicable law, Buyer and User agree to hold ARBORJET, INC. and Seller harmless for any claims relating to such factors.

ARBORJET, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. To the extent permitted by applicable law: (1) this warranty does not extend to the use of the product contrary to label instructions or under conditions not reasonably foreseeable to or beyond the control of Seller or ARBORJET, INC., and (2) Buyer and User assume the risk of any such use. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, ARBORJET, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS WARRANTED BY THIS LABEL.**

To the extent permitted by applicable law, in no event shall ARBORJET, INC. be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ARBORJET, INC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ARBORJET, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ARBORJET, INC. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of ARBORJET, INC.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

IMPORTANT: Read entire label before using this product. Failure to follow label instructions may result in poor control or tree injury. Failure to follow label directions may cause injury to people, animals and environment.

APPLICATION TO TREES

TREE-äge G4 is for control of mature and immature arthropod pests of deciduous, coniferous, and palm trees, including, but not limited to, those growing in residential and commercial landscapes, parks, plantations, seed orchards, and forested sites (in private, municipal, state, tribal and national areas). TREE-äge G4 contains the active ingredient emamectin benzoate and is formulated to translocate in the tree's vascular system when injected. This product must be placed into active sapwood, and will actively control pests for up to two years.

USE DIRECTIONS

TREE-äge G4 is designed for use with tree injection devices that meet the label and dose requirements [(for example, the Arborjet Tree Injection Systems)] for the control of listed pests of trees. Follow manufacturer's directions for equipment use.

Dosages are based on the Diameter (in inches) of the tree at Breast Height (DBH). Breast height is defined as 4.5 feet (1.37m) above the ground on the uphill side of the tree.

The diameter is determined by measuring the circumference of the tree at DBH, and dividing the circumference (in inches) by three (3). To determine DBH" for multi-stemmed woody ornamentals, measure the DBH for each stem or branch and add together for the total DBH" per tree.

Placement of Application/Injection Sites: Inject at the base of the tree. Inject into the stem within 12 to 24" of the soil, into the trunk flare or into tree roots exposing them by shallow excavation. Make applications into intact, healthy sapwood. Do not inject into injured areas or areas with decay.

Number of Injection Sites: Work around the tree, spacing injection sites approximately every 4 to 8 inches of tree's circumference.

Drill Depth: Drill through the bark then 5/8" to 2" into the sapwood with the appropriate sized drill bit. Use clean, sharp drill bits. Precautions should be taken to avoid diseased areas and transferring infected tissues to other injection sites.

Resinous Conifers

In resinous conifers, such as pine and spruce, start the injection immediately after drilling into the sapwood.

Palms

Make applications into palms 2-3 feet from the soil level, above the lignified tissues. One (typical) to 4 injection points may be installed. Drill into the palm tissue 4" deep, or up to 1/3 trunk diameter.

WHEN TO TREAT

TREE-äge G4 contains the active ingredient emamectin benzoate, which is a glycoside insecticide. It is active against immature and adult stages of arthropods. The primary route of toxicity is through ingestion.

ENVIRONMENTAL CONDITIONS: Uptake of TREE-äge G4 is dependent upon the tree's transpiration. For better uptake, apply when soil is moist, soil temperatures are above 45°F, ambient temperatures are between 40° to 90°F, and during the 24 hour period when transpiration is greatest, typically before 2:00 PM. Applications to drought- or heat-stressed trees may result in injury to tree tissue, poor treatment and subsequent control. Avoid treating trees that are moisture stressed or suffering from herbicide damage.

MONITOR TREE HEALTH and PEST INFESTATIONS: Effective injection treatment is favored by a full canopy (i.e., leaves) and healthy vascular system. Once these tissues are compromised by arthropod damage (larval galleries, defoliation, leaf mining, etc.) an effective and uniform application of TREE-äge G4 may be difficult to achieve and subsequent control may be poor. Optimally, treatment should be made preventively at least 2 to 3 weeks before arthropods historically infest the host tree. As a result of systemic movement and longevity of TREE-äge G4 in trees, this interval may be extended much earlier to 6 months should tree dormancy, adverse weather, management, asynchronous life cycle of pests, etc., allow earlier application timing.

TREE-äge G4 may also be effective as a remedial treatment against some pests, such as those with slower development or if multiple life stages occur. Pests that attack the stem and branches may disrupt vascular tissue, resulting in poor distribution of the product in an infested tree. However, control may be achieved if susceptible larvae come into contact or feed on TREE-äge G4-treated tissues.

USE

Use as formulated or dilute with equivalent of 1 to 9 volumes of water. Refer to Application in Trees Table for specific instructions.

USE RATE TABLE [*]

Tree Diameter (DBH) (Inches)	Low ¹ ml. product/tree	Medium ml. product/tree	High ml. product/tree
4 to 6	10-20	20-45	45-60
7 to 9	20-30	30-65	65-90
10 to 12	25-35	35-90	90-120
13 to 15	30-45	45-110	110-150
16 to 18	40-55	55-135	135-180
19 to 21	50-60	60-160	160-210
22 to 24	55-70	70-180	180-240
25 to 27	65-80	80-200	200-270
28 to 30	70-90	90-225	225-300
31 to 33	80-100	100-250	250-330
34 to 36	85-110	110-270	270-360
37 to 39	90-120	120-290	290-390
≥40	120-240	240-300	300-400

[Optional Use Rate Table]

[CALIFORNIA USE RATE TABLE]

Tree Diameter (DBH) (Inches)	Low ¹ ml. product/tree	Medium ml. product/tree	High ml. product/tree
4 to 6	15-20	20-45	45-60
7 to 9	20-30	30-65	65-90
10 to 12	30-35	35-90	90-120
13 to 15	35-45	45-110	110-150
16 to 18	42-55	55-135	135-180
19 to 21	50-60	60-160	160-210
22 to 24	-	115-180	180-240
25 to 27	-	130-200	200-270
28 to 30	-	145-225	225-300
31 to 33	-	160-250	250-330
34 to 36	-	175-270	270-360
37 to 39	-	190-290	290-390
≥40	-	205-300	300-400

The use of low, medium, or high dose per tree is based on the experienced judgment of the applicator as to what constitutes a low, medium or high infestation.

Higher rates tend to provide longer residual and control of more difficult to control insects. See **Target Pest** for additional information in choosing the amount of product to apply.

If the tree canopy has been significantly reduced, i.e., excessive tree pruning or turning trees into a hedge, reduce dose accordingly.

¹In Palms always use the low ml. product/tree.
[*Not for use in the State of California.]

Applications in Trees

Tree Tissue	Target Pest	Application Rate ¹	Comments
Seed and Cone	Coneworm (<i>Dioryctria</i> spp.) Cone beetle (<i>Conophthorus</i> spp.) Pine Cone Seed Bug (suppression of <i>Leptoglossus</i> and <i>Tetyra</i> spp. in the year of treatment)	Medium to High	For optimal control apply in the fall for early season pests or at least 30 days before insect attack.
Bud and Leaf	Tent Caterpillars (including Eastern, Forest, Pacific, and Western) Western Spruce Budworm Winter Moth	Low to Medium	For best results, apply at least 2-3 weeks before the pest has historically been present. Consult with local extension agent for when this will occur in your area.
	Bagworm Cankerworm Casebearer [*] Eastern Oak Looper Elm Spanworm Fall Webworm Gypsy Moth Leafrollers Linden Looper Mimosa Webworm Oak Worm Pine Needle Miner [*] Poplar Tentmaker [*] Tussock Moth Variable Oakleaf Caterpillar [*] Yellownecked Caterpillar [*] Leafminers (including Lepidoptera, Coleoptera, Hymenoptera) Honeylocust Plant Bug Pine Needle Scale Conifer Mite Red Palm Mite Sawfly (including Elm, Pine)	Low to High	For more uniform distribution in the canopy (foliage), dilute product with equivalent 1 to 9 volumes of water prior to application.

Tree Tissue	Target Pest	Application Rate ¹	Comments
Shoot, Stem, Trunk and Branch	Clearwing Borers (including Ash, and Sequoia Pine Pitch Tube Moth) Carpenterworm [*] Cottonwood Twig Borer Zimmerman Moth	Low to Medium	For best results, apply at least 30 days before historical egg hatch or adult flight and to trees whose vascular tissue is not damaged.
	Flat-headed Borers (including adult and larvae of Emerald Ash Borer)	Medium to High	For more uniform distribution in the canopy (foliage), dilute product with equivalent 1 to 9 volumes of water prior to application.
	Gall Wasps, including Banyan Stem Gall Wasp [*] Roundheaded Borers (excluding Asian Longhorned Beetle) Ambrosia Beetles (including Polyphagous Shot Hole Borer, <i>Euwallacea fornicatus</i>) ² Scolytids (bark beetles) <i>Ips</i> Engraver Beetles ^{3,4} Mountain Pine Beetle ^{2,3} Southern Pine Beetle ³ Spruce Beetle ³ Western Pine Beetle ³ Black Turpentine Beetle ³ Walnut Twig Beetle ^{2,4} Pinewood Nematode	Medium to High	If vascular tissue is damaged or plugged by insect galleries, nematodes or fungi, uniform treatment and control may not be achieved. <u>For bark beetles that attack the tree bole:</u> for more uniform distribution within the tree bole, inject every 4 inches of stem circumference. <u>For bark beetles that attack the canopy:</u> dilute product with equivalent 1 to 9 volumes of water prior to application.

¹Use medium to high rates for remedial and longer residual control.

²Use of TREE-äge G4 to control this insect may not result in the control of diseases vectored by the insect.

³Bark beetles that attack the tree bole

⁴Bark beetles that attack the canopy

[*Not for use in the State of California.]

Compatibility

Do not mix TREE-äge G4 before injection with other products such as insecticides, fungicides, plant growth regulators, surfactants, adjuvants, and fertilizers.

RESTRICTION

Do not apply to trees that may yield food consumed by humans or used in animal feed. TREE-äge G4 is not to be reformulated or blended.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage

Store in a cool, dry place, away from children and pets. Keep from freezing.

Pesticide Disposal

Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling

[Use the following for nonrefillable containers 5 gallons or less]

Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

[Use the following for nonrefillable containers too large to shake (larger than 5 gallons or 50 pounds)]

Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple Rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

[Use the following for refillable containers]

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available or

reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved state and local authorities.

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For non-emergency (e.g., current product information), call Arborjet, Inc. at 1-781-935-9070.
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Manufactured by [for]:
Arborjet, Inc,
99 Blueberry Hill Road
Woburn, Massachusetts 01801

(Non-detachable container label)

TREE-äge G4

Injected insecticide for **two-year control of listed insect and mite pests in deciduous, coniferous, and palm trees**

Active Ingredient:	
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EPA Reg. No. 74578-XXXXX

EPA Est. No. 74578-MA-001

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Manufactured by [for]:

Arborjet, Inc.

99 Blueberry Hill Road

Woburn, MA 01801